

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>KEIA THOMPSON, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>APEX GLOBAL SOLUTIONS, LLC,</p> <p style="text-align: center;">Defendant,</p>	<p>Case No.: 7:25-cv-05021</p>
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**~~PROPOSED~~ ORDER GRANTING PLAINTIFF’S MOTION FOR CONSOLIDATION
AND APPOINTMENT OF INTERIM CLASS COUNSEL**

This matter came before the Court on Plaintiff’s motion for consolidation and appointment of Interim Class Counsel. Upon consideration of the motion, any responses or oppositions thereto from counsel for Defendant and counsel for Plaintiffs in the related cases, and all supporting papers filed in support of the motion or any response or opposition thereto, **FOR GOOD CAUSE SHOWN**, Plaintiff’s motion is **HEREBY GRANTED**. The following actions are hereby consolidated pursuant to Federal Rule of Civil Procedure 42(a):

- (1) *Thompson v. Apex Global Solutions, LLC*, No. 7:25-cv-05021;
- (2) *Morrison v. Apex Global Solutions LLC*, No. 1:25-cv-05034;
- (3) *Williams v. Apex Global Solutions, LLC*, No. 7:25-cv-05040; and
- (4) *Daly v. Apex Global Solutions, LLC*, No. 1:25-cv-05198 (collectively, the “Consolidated Actions”).

The Court further Orders that Kopelowitz Ostrow PA and Finkelstein, Blankinship, Frei-Pearson & Garber, LLP—are hereby appointed Interim Class Counsel under Federal Rule of Civil


Procedure 23(g)(3). Within thirty (30) days of this Order, Interim Class Counsel shall file a Consolidated Amended Class Action Complaint.

If any actions filed in this Court in the future shall be related to any of these pending related cases, they will be consolidated with these Consolidated Actions. Interim Class Counsel shall serve a copy of this Order on all counsel in any such future-filed related cases. All papers filed in the Consolidated Actions shall be filed under Case No. 7:25-cv-05021, the lowest docketed case.

Interim Class Counsel shall have the authority and overall responsibility to litigate this action, speak for the named plaintiff(s) and absent putative class members, and shall be solely responsible for: making or approving any filings made on behalf of any plaintiffs in this action; engaging in discussions with Defendant's counsel; litigating and trying the action; engaging in: settlement discussions (including but not limited to, mediations, arbitrations, Alternative Dispute Resolution programs, and informal or formal settlement talks). Interim Class Counsel shall have sole responsibility for decisions on whether and how to associate with, or allocate work among, any plaintiffs' counsel working on the case. No filing on behalf of plaintiffs shall be made in the case without the consent of Interim Class Counsel. Interim Class Counsel shall be responsible for maintaining and collecting contemporaneous time, billing, and expense records for any work done on behalf of plaintiffs in this action. No later than ten (10) days following the filing by Interim Class Counsel of plaintiff's motion for class certification, any interested party wishing to have the Court reconsider this interim designation of class counsel may file an appropriate motion to that effect and argue why the Court's Order should be reconsidered.

IT IS SO ORDERED.

Dated: June 30, 2025

By: 

Hon. Philip M. Halpern,
United States District Judge